

Letter to Hon. Brian M. Cogan
February 17, 2022
Exhibit 3

Proposed Matters for Rule 30(b)(6) Examination of Defendant Qatar Charity
(Limited to Personal Jurisdiction)

The person(s) designated must testify about information known or reasonably available to the organization concerning the matters listed below, for the period of time from January 1, 2011 through and including December 23, 2016 (the “Relevant Time Period”). The definitions set forth in Plaintiff’s First Request for the Production of Documents Directed to Defendant Qatar Charity (dated February __, 2022) are incorporated herein by reference.

1. All USD Accounts maintained for You, in Your name, or for Your benefit during the Relevant Time Period by Defendant Qatar National Bank, Defendant Masraf al Rayan, or any other financial institutions anywhere in the world (the “Accounts”), including without limitation the agreements and terms governing those accounts, and the way in which U.S. dollars were transferred from the Accounts to financial institutions other than those where the Accounts were maintained during the Relevant Time Period, including how the financial institutions maintaining the Accounts processed U.S. dollar transactions.

2. Any method other than the use of an account located in the U.S. by which, during the Relevant Time Period: (a) You received or made inter-bank payments denominated in U.S. dollars; (b) You received or made inter-bank payments that involved the conversion of another currency into U.S. dollars or U.S. dollars into another currency; or (c) inter-bank payments denominated in U.S. dollars or which involved the conversion of another currency into U.S. dollars or U.S. dollars into another currency were made on Your behalf during the Relevant Time Period, including, in all cases the identities of any financial institutions that facilitated such inter-bank payments.

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3. All periodic account statements for the Relevant Time Period for the USD Accounts identified in Your response to Interrogatory No. 1 of Plaintiffs' First Set of Interrogatories to Defendant Qatar Charity (dated February ___, 2022), including without limitation Your understanding of the entries on those statements.

4. Any transfer of U.S. dollars that You made or that was made on Your behalf to or for the benefit of Hamas, PIJ, the Individuals, any other persons affiliated with Hamas, PIJ, or any charitable organizations located in the Palestinian administered territories during the Relevant Time Period, including to the accounts of any such entities at the Bank of Palestine or the Islamic Bank in Ramallah. (This topic includes how those transactions were processed and whether any financial institutions located in the U.S. were involved in such transfers).

5. Your communications with Defendant Qatar National Bank or Defendant Masraf al Rayan during the Relevant Time Period concerning: (a) any inter-bank transfer of U.S. dollars; (b) any correspondent, nostro, or vostro account maintained in the U.S. by Defendant Qatar National Bank or Defendant Masraf al Rayan; or (c) the ability of either Defendant Qatar National Bank or Defendant Masraf al Rayan to effectuate inter-bank transfers in U.S. dollars on Your behalf.

6. Your communications with Defendant Qatar National Bank or Defendant Masraf al Rayan during the Relevant Time Period concerning Hamas, PIJ, the Individuals, Sanabel Cards or the transfer of funds directly or indirectly to any charitable organizations in the Palestinian administered territories.